



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

SR-6J

October 8, 1997
FPD09716

EPA Region 5 Records Ctr.



248060

Mr. Joseph Benedict
Forest Preserve District of DuPage County
P.O. Box 2339
Glen Ellyn, IL 60138

RE: Proposed Investigation of the North Stormwater Pipe and Surface Water Sampling of Sand Pond

Dear Mr. Benedict:

The U.S. Environmental Protection Agency and the Illinois Environmental Protection Agency (the Agencies) have reviewed the August 28, 1997, Addenda to Sampling Plans, Proposed Investigation of the North Stormwater Pipe and Surface Water Sampling of Sand Pond submitted by Montgomery Watson. Based on our review of the document, we have the following comments.

Transmittal Letter

Page 2, paragraph 1 of the transmittal letter states that samples will be taken at a depth equal to, or just greater than, the depth of the discharge pipe. The samples should be obtained from soil below the elevation of the pipe. Also, the samples should not be taken from within the trench area that was backfilled with rock. The concern here is that the samples must be taken sufficiently close to and below the pipe such that the area sampled would be impacted by flow from the pipe, but not a sample of the gravel backfill which may not contain any contaminant residuals. Also, a second deeper sample should be taken (i.e., 3- 5 feet below the discharge pipe) to provide more certainty on the possible vertical extent of contamination.

Page 2, paragraph 2 of the transmittal letter states that the subsurface soil investigation will involve collecting one soil sample from two locations approximately one-third and two-thirds the distance between manhole 1 (MH-1) and manhole 2 (MH-2). The distance between the two manholes is about 250 feet. Two samples appears insufficient to characterize the 250 linear feet of pipe and the discharge area. Sampling should include sampling on both sides of the collector trench and in the area of discharge into the woods. Additional justification should be provided on the proposed sampling density and a map of the proposed sample locations should be included.

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Page 2, paragraph 3 of the transmittal letter and page 4, item 6 of the Addendum to the FSP state that a background groundwater sample will be collected from Pine Lake. However, note 7 in Table 1 of Addendum No. 4 to the QAPP states that a surface water sample will be collected from Pine Lake. A clarification should be made whether this is a groundwater or surface water sampling and a discussion of how the results of this sample will be used should be included.

Addendum No. 4 to the FSP

In Section 2.3, Surface Water Sampling, the text on page 4 does not discuss sediment sampling at Sand Pond and Pine Lake. If sediment sampling is to be conducted in accordance with the August 1990 work plan for the RI/FS, it should be stated in Section 2.3. Further, if there are any changes from past protocols and procedures for sediment sampling, these changes should be presented.

Addendum No. 4 to the QAPP

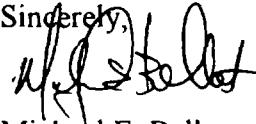
Table 1, note 5 states that the matrix spike/matrix spike duplicate (MS/MSD) samples will not be collected but will be analyzed and the results reported in accordance with standard operating procedures (SOPs) and standard laboratory practices. This note appears to indicate that no additional sample volume will be collected for the MS/MSD samples. If this is the case, this note applies to soil and sediment samples but not to surface water samples. This should be clarified.

Note 7 discusses surface water and sediment samples. As appropriate, this note should be clarified whether a surface water or groundwater sample will be collected at Pine Lake. Further, it should note that one surface water and one sediment sample will be collected from Sand Pond.

A very minor comment regarding Table 2 is that it identifies container, preservative, and packaging requirements for soil and sediment samples. The title may imply that surface water sampling (i.e., surface water investigations) is being discussed. Also, please verify the container size for semi-volatile organic compounds (i.e., 16 oz. versus 4 oz.).

Please make the appropriate changes and resubmit the document for final approval. If you would like to discuss this letter, or any of the comments in greater detail, please do not hesitate to contact me at (312) 353-6425 and we can set up a conference call with Rick Lanham.

Sincerely,



Michael E. Bellot
USEPA Remedial Project Manager

cc: Rick Lanham, IEPA
Jerry Hartwig, FPD
Peter Vagt, MW
Walter Buettner, MW
Kostas Dovantzis, PRC